

IN THE DISTRICT COURT OF LINCOLN COUNTY
STATE OF OKLAHOMA

LATOSHA R. DAVIS,

Plaintiff,

vs.

PRAGUE COMMUNITY HOSPITAL
and DR. VISHAL AGGARWAL, d/b/a
SANRAJ SOLUTIONS and
TRANSCENDENTAL UNION WITH
LOVE AND SPIRITUAL
ADVANCEMENT,

Defendants.

Case No.

CJ. 20-102

FILED

SEP 15 2020

CINDY KIRBY, COURT CLERK
LINCOLN COUNTY, OKLAHOMA

COMES NOW the Plaintiff, LaTosha R. Davis (hereinafter referred to as "Plaintiff"), Pro Se, and for her cause of action and claims for relief against the above-named Defendants, she states the following:

PARTIES

1. That Plaintiff is and was at all times alleged herein a citizen and resident of the City of Shawnee, Pottawatomie County, State of Oklahoma.

2. That the Plaintiff was employed with Defendants as a Human Resources Manager from July 1, 2020 through August 28, 2020.

3. That the Defendant, Prague Community Hospital, is a domestic not for profit corporation and is situated in the City of Prague, Lincoln County, State of Oklahoma; and is owned by Defendant Dr. Vishal Aggarwal.

4. That Defendant Dr. Vishal Aggarwal is doing business as Sanraj Solutions, which is

EXHIBIT 1

not a business registered with the Oklahoma Secretary of State; however, said business name appears on paychecks received by employees of the Defendants.

5. That Defendants, Dr. Vishal Aggarwal and Prague Community Hospital, also are currently doing business as Transcendental Union with Love and Spiritual Advancement, which is a domestic not for profit corporation.

JURISDICTION AND VENUE

6. That this Honorable Court has proper venue and jurisdiction over these proceedings pursuant to 12 O.S. §133, in that Defendant, Prague Community Hospital, is the official location of said Defendant in Lincoln County, Oklahoma; and Lincoln County is the location where all matters alleged herein took place.

STATEMENT OF CASE

7. That during the pay period of August 9, 2020 through August 22, 2020, several employees of Defendant were required to work extra hours due to the conditions related to the COVID-19 pandemic.

8. That during this time period, the patient census was high.

9. That during this time period there were also many employees who were unable to work due to illness.

10. That on August 28, 2020, Defendants terminated Plaintiff.

11. That Defendant alleged the reasoning for Plaintiff's termination was for working excessive overtime hours, which was necessary in order to meet the needs of the hospital patients.

12. That during the pay period of August 9, 2020 through August 22, 2020, many other employees worked excessive overtime without any adverse reaction from Defendants; and many of

these employees had acquired a significantly larger amount of overtime hours than Plaintiff.

13. That Plaintiff was treated in a different manner than other employees during her employment with Defendants due to the fact she was the only African-American woman employed by Defendants, and Plaintiff was the only African-American employee in a management position.

14. That Plaintiff was wrongfully terminated due to her race which is in direct violation of 25 O.S. §25-1350 (2014).

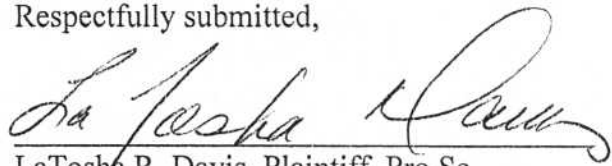
15. That the Plaintiff filed a complaint with the Equal Employment Opportunity Commission which is currently pending under Inquiry No. 564-2020-01913.

16. That Plaintiff should be compensated for compensatory damages and punitive damages, and the Court should grant her a judgment in excess of \$10,000.00, and for any and all equitable relief the Court deems just.

17. That Defendants should be ordered to reimburse Plaintiff for any and all costs she has incurred, or shall incur, in relation to this matter.

WHEREFORE, the Plaintiff prays that judgement be granted in her favor and against the Defendants, and that this Court grant any and all equitable relief it deems to be just and proper.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "LaTosha R. Davis".

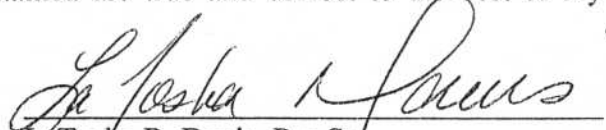
LaTosha R. Davis, Plaintiff, Pro Se
4110 North Market Avenue
Shawnee, Oklahoma 74804

VERIFICATION

STATE OF OKLAHOMA,)
)
COUNTY OF OKLAHOMA,) ss.

I, LaTosha R. Davis, being first duly sworn, depose and state as follows:

That I am the Plaintiff named, herein, that I have read the above and foregoing Petition and know the contents thereof and that the facts contained are true and correct to the best of my knowledge and belief.


LaTosha R. Davis, Pro Se

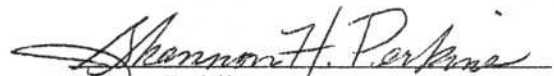
Subscribed and sworn to before me this 15TH day of September, 2020.

My Commission Expires:

7-25-22

My Commission No.:

18007404


Notary Public

